

**KRITZER LAW GROUP**  
**180 EAST MAIN STREET, SUITE 204**  
**SMITHSTOWN, NEW YORK 11787**  
**631-982-0080 TEL, EX 104**  
**CBLANCHARD@KRITZERLAWGROU**  
**P.COM**

The initial pretrial conference scheduled for March 12, 2025, is **ADJOURNED to March 18, 2025, at 3:15 P.M.** The conference will be in person at the United States Courthouse, Southern District of New York, 40 Foley Square, New York, NY, 10007 at Room 1106. If lead counsel for any party is located outside of New York City or would experience a hardship from an in-person appearance and would prefer to appear remotely, they should notify the Court immediately by filing a letter on the docket so that arrangements can be made. The Court generally does not adjourn initial pretrial conferences pending settlement discussions.

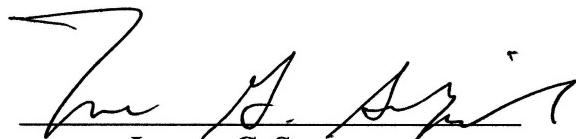
**VIA ECF** March 6, 2025

Hon. Lorna G. Schofield, USDJ  
U.S. District Court  
Eastern District of New York

By **March 12, 2025**, the parties shall file their pre-conference joint letter, pursuant to the Orders at Dkt. Nos. 7 and 15. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 18.

Dated: **March 7, 2025**  
New York, New York

**Re: Colon v. Bronx Nissan, Inc., et al., Docket No.: 24-CV-8825**  
**Report on Settlement Discussions**



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Dear Hon. Judge Schofield;

Our office represents the Defendants in connection with the above matter.

We write jointly with Plaintiff's counsel to request an extension of time for the Plaintiff to file an amended complaint, for the Defendants to answer such complaint, to permit the parties to continue settlement discussions and to reschedule the preliminary conference presently scheduled for March 12, 2025.

The parties confirm that they have exchanged core discovery documents and have engaged in settlement discussions. However, during those discussions, it was confirmed that there was a typographical pleading error in the Complaint which was substantial to the allegations and the Defendants' response thereto. Thus the parties jointly request that Plaintiff be permitted to amend its complaint, on consent, and file the same on or before March 14, 2025. Correspondingly, we also ask that Defendants' time to respond to the Complaint be extended up to and including March 28, 2025, and time to implead any third party be extended to April 11, 2025.

Additionally, the parties also request that the preliminary conference scheduled for March 12, 2025 be adjourned to April, 8<sup>th</sup> or 9<sup>th</sup> at a time convenient to the Court. The parties shall continue to review if this matter may be settled.

We appreciate Your Honor's review of this request.

Should you have any further questions, do not hesitate to contact our office.

Sincerely,



**Craig Blanchard**  
**Craig Blanchard, Esq.**

Cc: Robert Nahoum, Esq., via ECF